



August 25, 2008

Alex Baker  
ENERGY STAR Lighting Program Manager  
US Environmental Protection Agency  
Washington DC. 20460

Dear Mr. Baker:

TCP respects and values its relationship with both the EPA and the DOE and welcomes the opportunity to comment on the recent revision to the EPA's residential light fixture specification version 4.1.

Our first and greatest concern is the existence of two completely separate SSL specifications. This is further complicated by the ongoing rebuttals being published by both agencies. Even if the industry is able to untangle this puzzle, we doubt consumers will. Our concern is consumers will see similar ENERGY STAR listed products performing differently. Inconsistent performance could delay the adoption of SSL technology as well as undermine the value of the ENERGY STAR label and program. The present situation is not good for ENERGY STAR, manufacturers or consumers.

TCP is specifically concerned with:

1. The EPA references ASSIST Recommends, which are not industry standards. DOE developed their specification to multiple reviews and inputs from all major lighting industry standards organizations.
2. Color Temperature: we do not agree with "labeling with respect to color temperature, allowing EPA to monitor values for acceptable ranges" on product packaging. We prefer specific temperature limits as indicated in the DOE specification.

TCP would like to urge the EPA and the DOE to act and speak as one voice. Until such time, it is TCP's plan to treat the DOE's documentation as the definitive ENERGY STAR criteria for SSL.

Thank you for the opportunity to submit comments. If you have questions or would like to discuss further, I can be reached at [MObradovic@tcp.com](mailto:MObradovic@tcp.com) or at 330-995-1034.

Sincerely,

*Melissa Obradovic*

Melissa Obradovic  
ENERGY STAR Program Manager